

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMDOCS (ISRAEL) LIMITED, an Israeli
Corporation,

Plaintiff,

v.

OPENET TELECOM, INC., a Delaware Corporation,
and OPENET TELECOM LTD., an Irish Corporation,

Defendants.

Case No. 1:10-cv-910 (LMB/TRJ)

JURY TRIAL DEMANDED

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO FILE UNDER SEAL AND
CROSS-MOTION TO FILE OPENET'S OPPOSITION TO AMDOCS' MOTION TO
COMPEL 30(b)(6) TESTIMONY AND INTERROGATORY RESPONSES UNDER SEAL**

Defendants Openet Telecom, Inc. and Openet Telecom Ltd. ("Openet") do not oppose Amdocs (Israel) Limited's ("Amdocs") motion to file under seal the memorandum in support of Amdocs' Motion to Compel 30(b)(6) Testimony and Interrogatory Responses and the accompanying exhibits.

Further, Openet respectfully moves for leave to file under seal Openet's Opposition to Amdocs' Motion to Compel 30(b)(6) Testimony and Interrogatory Responses and accompanying exhibits. The basis for this request is that portions of the brief and exhibits pertain to the operation and other proprietary details of Openet's accused infringing product and thus reflect information, documents, and deposition testimony Openet has designated as "Highly Confidential" under the stipulated Protective Order (Dkt. # 35). Openet thereby requests that these materials not be made part of the public record and be placed under seal.

Openet respectfully requests this matter to be heard at the same time as the hearing on Amdocs' Motion to Seal, set for this Friday, March 25, 2011 at 10:00 a.m. or as soon thereafter as this matter can be heard.

March 23, 2011

Respectfully submitted,

/s/ Joseph Shin

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*Counsel for Openet Telecom, Inc. and Openet
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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of March, 2011, I filed the foregoing Defendants' Response to Plaintiff's Motion to File Under Seal and Cross-Motion to File Openet's Opposition to Amdocs' Motion to Compel 30(b)(6) Testimony and Interrogatory Responses Under Seal with the Clerk of Court via CM/ECF which will then send a notification of such filing to following counsel for Amdocs (Israel) Ltd.

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